



# Triangle Telephone Cooperative Association, Inc.

P.O. Box 1220 • Havre, Montana 59501-1220

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**EB-06-TC-060**

## **CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: EB Docket No. 06-36; EB-06-TC-060

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Richard Stevens  
General Manager

Cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)

**ANNUAL CERTIFICATE OF COMPLIANCE AS REQUIRED BY  
SECTION 64.2009(e) OF THE RULES AND REGULATIONS OF THE  
FEDERAL COMMUNICATIONS COMMISSION**

The undersigned attests and certifies as follows:

1. I am a corporate officer of Triangle Telephone Cooperative Association, Inc. ("Triangle").
2. I have personal knowledge that Triangle has established and implemented the accompanying Statement of Procedures to ensure compliance with the Rules and Regulations of the Federal Communications Commission regarding Customer Proprietary Network Information.
3. The accompanying copy of the Statement of Procedures explains and demonstrates how Triangle's operating procedures ensure compliance with the applicable rules and regulations.



Verlin Reichelt

President

December 21, 2005

**STATEMENT OF PROCEDURES  
ADOPTED BY  
TRIANGLE TELEPHONE COOPERATIVE ASSOCIATION, INC.  
TO ENSURE COMPLIANCE WITH THE RULES AND  
REGULATIONS OF THE FEDERAL COMMUNICATIONS  
COMMISSION REGARDING THE PROTECTION OF CUSTOMER  
PROPRIETARY NETWORK INFORMATION ("CPNI")**

Our Company has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC's Rules and Regulations. We provide our customers notification of their rights with respect to their CPNI via a Privacy Statement. In addition, we have adopted the procedures set forth below.

**CPNI Use**

- (1) We recognize that we may use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We understand that we may use, disclose or permit access to CPNI to provide or market service offerings among the categories of service to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we understand that we may share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we may not share the customer's CPNI with an affiliate without the Customer's approval.
- (3) We understand that we may use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval,
- (4) In the absence of Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we understand that we may use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market, when we provide local service, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.
- (5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local

exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

### **CPNI Safeguard Procedures**

- (1) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place. Section 414 of our Company Employee Handbook contains the following provisions regarding nondisclosure of Customers' CPNI:

"Information including, but not limited to, customer's billing records, local and long distance records are confidential and may not be provided or discussed with anyone other than the customer without that customer's written authorization."

"Violation of these Confidentiality/Non-Disclosure requirements will result in discipline up to and including termination."

- (2) We will maintain a record of any instance of our own and our affiliates' sales and marketing campaigns that use Customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We will retain these records for at least one year.
- (3) We have established a supervisory review process regarding compliance with the CPNI rules for outbound marketing. Specifically, our marketing personnel are required to obtain supervisory approval of any proposed outbound marketing campaign that will use CPNI.
- (4) A corporate officer who acts as agent for the Company will sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established these operating procedures adequate to ensure compliance with applicable CPNI rules. This Statement of Procedures which sets forth our operating procedures and demonstrates compliance with the CPNI rules will be maintained together with the compliance certificate.

### **Review and Revision of Procedures**

We shall undertake the responsibility of reviewing these procedures on a continuing basis to ensure compliance with all Rules and Regulations regarding the utilization of CPNI. We shall revise these procedures on a timely basis to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.